

Roxana Firouzi
212.453.0777 (direct)
rfirouzi@grsm.com

GORDON & REES
SCULLY MANSUKHANI

ATTORNEYS AT LAW
1 BATTERY PARK PLAZA
28TH FLOOR
NEW YORK, NY 10004
PHONE: (212) 269-5500
FAX: (212) 269-5505
WWW.GORDONREES.COM

April 30, 2018

VIA WEBSITE SUBMISSION

Environmental Protection Agency

Re: *Karlene Holleman v. Avon Products, Inc., et al.*
Supreme Court of the State of New York, New York County
Index No.: 190077/2018

Dear Sir/Madam:

Please consider the following a formal request pursuant to the Freedom of Information Law. Under the provisions of the Illinois Freedom of Information Act 5 ILCS § 140, I hereby request a copy of any and all documents, records, correspondence, contracts, reports, logs, test results, permits, citations/violations, hazardous waste disposal manifests, or any other records in any form (written or digital) pertaining to:

Don & Elevator Defoe

2050 Anderson Drive S.E., Grand Rapids, MI

Hope Protestant Reformed Christian School

1545 Wilson Ave SW, Grand Rapids, MI 49534

Phone: (616) 453-9717

Adams Street Christian School

Adams Street S.E., Grand Rapids, MI

South Holland Protestant Reformed Charter School

(Protestant Reformed Christian)

16511 South Park Ave, South Holland, IL 60473

South Holland Protestant Reformed Charter School

(Protestant Reformed Christian)

164 South Park Avenue, South Holland, IL 60473

De Jong Brothers Farms

18337 Stony Island Avenue, Lansing, IL 60438

Hebert Holleman Jr.

1042 Volbretch Road, Crete, IL 60417

Drinker Biddle & Reath LLP (f/k/a Gardner Carton Douglas)

191 N. Wacker Dr., Ste. 3700, Chicago, Illinois 60606-1698

Ford & Harrison LLP (f/k/a Matkov Salzman)
180 North Stetson Avenue, Suite 1660, Chicago, Illinois 60601

A.T. Kearny
227 W Monroe St, Chicago, IL 60606

Cambridge Realty
1 North LaSalle Street #3700, Chicago, IL 60602

With respect to the locations above, please accept this letter as a request for copies of the following documents specifically during the timeframe of **1950 to present**.

- Any and all records regarding asbestos;
- Any and all records regarding inspections for asbestos;
- Any and all records regarding installation or removal of asbestos;
- Any and all records pertaining to use of asbestos-containing products and asbestos-containing equipment;
- Any and all records regarding policies, procedures, inspection reports, asbestos management plans, and asbestos abatement actions performed pursuant to Asbestos Hazard Emergency Response Act (AHERA), or any other applicable governing authorities, including OSHA;
- Any and all records relating to air testing, or other dust-release testing performed and any and all asbestos analysis data sheets;
- Any and all records relating to asbestos remediation, including those that identify asbestos removal contractors and any contracts or reports for the removal of asbestos; and
- Any and all specification sheets for insulating materials, including but not limited to pipe insulation.

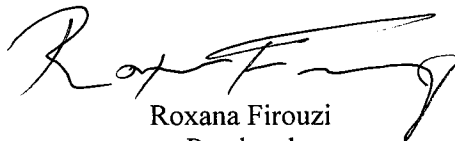
In order to help you to determine my status to assess fees, please note that I am seeking the above information for use in a pending lawsuit. I am willing to pay fees for this request up to a maximum of \$100.00. If you estimate that the fees will exceed this limit, please contact me first.

If you deny any part of this request, please cite each specific reason you believe justifies your refusal to release the information and notify me of the applicable appeal procedures available under the law.

If you have any questions regarding the processing of this request, please do not hesitate to contact the undersigned. Thank you for your consideration of my request.

Regards,

Gordon Rees Scully Mansukhani, LLP



Roxana Firouzi
Paralegal